

Jenny Scovis, Esq., State Bar No. 87026
Kim D. Scovis, Esq., State Bar No. 182059
LAW OFFICES OF KIM D. SCOVIS
223 East Thousand Oaks Boulevard, Suite 412
Thousand Oaks, California 91360
Telephone: (805) 496-6413 Facsimile: (805) 379-3966

Attorneys for Plaintiff, MARIA LAZOS as an individual, and *THE ESTATE OF THOMAS BARRERA, By and Through its Successor in Interest, MARIA LAZOS*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARIA LAZOS, *THE ESTATE OF THOMAS BARRERA, By and Through its Successor in Interest, MARIA LAZOS*

Plaintiff,

vs.

CITY OF OXNARD; OXNARD POLICE DEPARTMENT; POLICE CHIEF JOHN CROMBACH; ANDREW SALINA, and DOES 1-10

Defendants.

AND CONSOLIDATED ACTION

Case No. CV08-02987-RGK (SHx)

(consolidated w/ CV 08-05153 RGK)

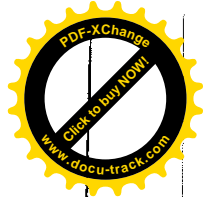
**STIPULATION BY ALL COUNSEL TO
EXTEND TIME TO FILE FINAL
PRETRIAL DOCUMENTS**

[PROPOSED ORDER]

TO THE HONORABLE R. GARY KLAUSNER, JUDGE OF THE FEDERAL COURT:

IT IS HEREBY STIPULATED, by and between the parties, Plaintiff, Mario Lazos, TOMAS BARRERA and *THE ESTATE OF THOMAS BARRERA BY AND THROUGH ITS SUCCESSORS IN INTEREST MARIA LAZOS and TOMAS BARRERA* and defendants, the City of Oxnard, Chief John Crombach and Sargent Andrew Salinas, through their counsel of record, Dirk DeGenna hereby stipulate and agree as follows:

The Parties are in the process of filing the Joint Exhibit List, Joint Witness List, and



1 Memoranda Of Facts and Law pursuant to *Local Rule 16* et seq. These documents are
2 currently due to be filed on or before July 06, 2009. However, counsel respectfully request
3 an extension up to and including July 10, 2009, to file these documents (hereinafter "FPT
4 Documents"). This request is made on the grounds that due to unforeseen circumstances and
5 inadvertent miscalculations of time, the extension of time is necessary to ensure complete
6 and proper compliance with all Federal and Local Rules pertaining to the contents and format
7 of FPT Documents. All parties apologize to the Court for the delay.

8 DATED: ~~June 26, 2009~~

7/1/09

LAW OFFICES OF KIM D. SCOVIS

KIM D. SCOVIS
Attorneys for Plaintiff

12 DATED: ~~June 26, 2009~~

7/1/09

LAW OFFICES OF GREGORY A. YATES

GREGORY A. YATES
Attorneys for Plaintiff

18 DATED: 7/1/09

LAW OFFICES OF ALAN WISOTSKY

DIRK DIGENNA

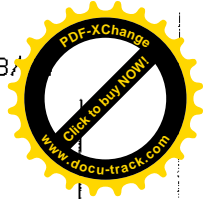
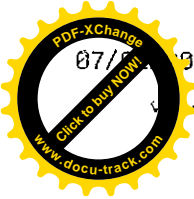
Attorneys for Defendants

26 ///

27 ///

28 ///



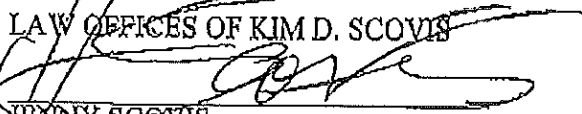


Memoranda Of Facts and Law pursuant to *Local Rule 16* et seq. These documents are currently due to be filed on or before July 06, 2009. However, counsel respectfully request an extension up to and including July 10, 2009, to file these documents (hereinafter "FPT Documents"). This request is made on the grounds that due to unforeseen circumstances and inadvertent miscalculations of time, the extension of time is necessary to ensure complete and proper compliance with all Federal and Local Rules pertaining to the contents and format of FPT Documents. All parties apologize to the Court for the delay.

DATED: ~~June 26, 2009~~

7/1/09

LAW OFFICES OF KIM D. SCOVIS


KIM D. SCOVIS
Attorneys for Plaintiff

DATED: ~~June 26, 2009~~

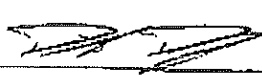
7/1/09

LAW OFFICES OF GREGORY A. YATES


GREGORY A. YATES
Attorneys for Plaintiff

DATED: 7/1/09

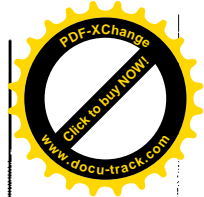
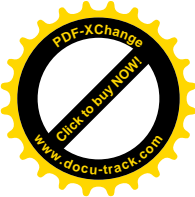
LAW OFFICES OF ALAN WISOTSKY


DIRK DIGENNA
Attorneys for Defendants

///

///

///



Jenny Scovis, Esq., State Bar No. 87026
Kim D. Scovis, Esq., State Bar No. 182059
LAW OFFICES OF KIM D. SCOVIS
223 East Thousand Oaks Boulevard, Suite 412
Thousand Oaks, California 91360
Telephone: (805) 496-6413 Facsimile: (805) 379-3966

Attorneys for Plaintiff, MARIA LAZOS as an individual, and *THE ESTATE OF THOMAS BARRERA, By and Through its Successor in Interest, MARIA LAZOS*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARIA LAZOS, <i>THE ESTATE OF THOMAS BARRERA, By and Through its Successor in Interest, MARIA LAZOS</i>)	Case No. CV08-02987-RGK (SHx)
Plaintiff,)	(consolidated w/ CV 08-05153 RGK)
vs.)	[PROPOSED] ORDER on
CITY OF OXNARD; OXNARD POLICE DEPARTMENT; POLICE CHIEF JOHN CROMBACH; ANDREW SALINA, and DOES 1-10)	STIPULATION BY ALL COUNSEL TO
Defendants.)	EXTEND TIME TO FILE FINAL
)	PRETRIAL DOCUMENTS
<u>AND CONSOLIDATED ACTION</u>)	

GOOD CAUSE APPEARING, the court upon considering the Joint Stipulation of Counsel to extend the deadline to file Final Pretrial(FTP) Documents from July 06, 2009 to July 10, 2009, does hereby grant the requested extension of time to file all FTP Documents up to and including July 10, 2009.

IT IS SO ORDERED

Dated: _____

By _____
Honorable Judge R. Gary Klausner
United States District Court Judge